



DEPARTMENT OF PLANNING
STAFF REPORT

PLANNING COMMISSION PUBLIC HEARING

DATE OF HEARING: September 17, 2009
ZCPA 2008-0008, ZMOD 2008-0016, WOODLAND ROAD – HALAC IRON WORKS
DECISION DEADLINE: January 1, 2010
ELECTION DISTRICT: Dulles PROJECT PLANNER: Marchant Schneider

EXECUTIVE SUMMARY

S. A. Halac Iron Works, Inc. of Sterling, Virginia, has submitted an application to amend the concept plan and proffers approved with ZMAP 1986-0022, Loudoun Woodland Road Joint Venture, in order to eliminate a proffered 50-foot buffer yard to the adjacent PD-IP (Planned Development – Industrial Park) zoning district as shown on the Concept Development Plan for ZMAP 1986-0022, with no resulting change in density. The consolidation of the subject property (Lot 14A) with an adjacent property outside the boundary limits of the previously approved ZMAP (former Parcel 6B) has necessitated the elimination of the buffer. The Applicant is also requesting modifications of Section 723.6.2 of the 1972 Zoning Ordinance in order to reduce the minimum yard for a building adjacent to a residential district boundary from 100 feet to 50 feet and reduce the minimum yard for parking/outdoor storage/loading adjacent to a residential district boundary from 50 feet to 10 feet. The setbacks were imposed on the subject property when the adjacent Victoria Station project was rezoned from PD-IP to R-16 in 2007.

The ZCPA and ZMOD application would permit the applicant to expand an existing steel fabrication facility (manufacturing) as well as construct an additional facility on the former Parcel 6B. The proposal would also eliminate the need to extend Ashgrove Court from its existing terminus to the former Parcel 6B.

The subject site is approximately 7.73 acres in size and is located on the south side of Woodland Road, approximately 1500 feet west of Cascades Parkway at the end of Ashgrove Court (See Vicinity Map). The subject site is split-zoned PD-IP (Planned Development - Industrial Park) and PD-GI (Planned Development - General Industrial). The proposed ZCPA and the ZMOD would apply only to the portion of the property located in the PD-GI zoning district that is administered under the 1972 Zoning Ordinance.

The area is governed by the policies of the Revised General Plan (Suburban Policy Area, Sterling Community) which designates this area for Keynote Employment uses. The property is located within the Route 28 Taxing District and located partially within the FOD (Floodplain Overlay District).

RECOMMENDATION

Staff Recommendation

Staff can support the request to eliminate a previously proffered buffer and reduce yard setbacks to residential zoning districts. Screening of uses outside the Woodland Road Industrial Park and protection of the County's Green Infrastructure will be provided to an equivalent degree.

SUGGESTED MOTIONS

1. I move that the Planning Commission forward ZCPA 2008-0008 and ZMOD 2008-0016, Woodland Road – Halac Iron Works, to a subsequent worksession for further discussion.

OR,

2. I move that the Planning Commission forward ZCPA 2008-0008 and ZMOD 2008-0016, Woodland Road – Halac Iron Works, to the Board of Supervisors with a recommendation of approval, subject to the Proffer Statement dated July 22, 2009, and with the Findings contained the September 17, 2009, Staff Report.

OR,

3. I move that the Planning Commission forward ZCPA 2008-0008 and ZMOD 2008-0016, Woodland Road – Halac Iron Works, to the Board of Supervisors with a recommendation of denial.

Vicinity Map



Directions:

From Leesburg, take Route 7 East to Route 28 South. Turn east on Severn Way and travel onto Woodland Road. Turn right onto Ashgrove Court. The entrance to the site is at the end of Ashgrove Court (21675 Ashgrove Court, Sterling VA).

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I. APPLICATION INFORMATION

APPLICANTS	S. A. Halac Iron Works, Inc. Ahmet Halac, President 21675 Ashgrove Court Sterling, VA 20166 703-406-4766
REPRESENTATIVE	Dave C. Culbert, Esquire Culbert & Schmitt, PLLC 30-C Catoctin Circle, SE Leesburg VA 20175 703-737-6377
APPLICANTS' REQUEST	A Zoning Concept Plan Amendment (ZCPA) to revise the approved Concept Development Plan for ZMAP 1986-0022, Loudoun Woodland Road Joint Venture, eliminate portions of a proffered 50' buffer yard, and a Zoning Modification (ZMOD) to reduce required setbacks adjacent to residential districts. The application was accepted on January 5, 2009.
LOCATION	21731 and 21675 Ashgrove Court, Sterling VA
PROPERTY/PARCEL #	Tax Map— /81/B/6////14/ MCPI— 031-48-0264-000
ZONING	PD-GI (Planned Development – General Industrial), (1972 Zoning Ordinance)
ACREAGE OF SITE	7.73 acres

SURROUNDING ZONING/ LAND USES

	ZONING	PRESENT LAND USES
NORTH	PD-GI	Industrial
SOUTH	PD-H6 & R-16	Residential
EAST	PD-IP & R-16	Industrial/Residential
WEST	PD-GI	Industrial

II. REFERRAL AGENCY COMMENT SUMMARY

TOPIC / ISSUE AREA	ISSUES EXAMINED AND STATUS
Comprehensive Plan	<ul style="list-style-type: none"> ○ Consistency with land use policies of the <u>Revised General Plan (RGP)</u> (Suburban Policy Area, Sterling Community). Status: No issue. Industrial use compatible with established Woodland Road Industrial Park and consistent with land use policies of the <u>Eastern Loudoun Area Management Plan (ELAMP)</u> which designated the area as appropriate for industrial and office land uses at the time of original project approval. Use is appropriate until such time as it is feasible to develop Keynote Employment uses in the area. ○ Delineate Green Infrastructure elements / implement Green Infrastructure policies on subject property (conserve wetlands, surface waters, forest resources, steep slopes). Status: Resolved. Concept Development Plan (CDP) and proffer statement amended to include commitments to conservation of existing vegetation (Tree Save Areas) and supplemental evergreen landscaping within designated areas (Proffer III and IV). ○ Clarify on CDP the limits of 50' buffer yard that is to be eliminated. Supplement vegetation along existing stream and associated floodplain to offset loss of vegetation from the buffer yard. Status: Resolved. CDP and proffer statement amended to include commitments to equivalent evergreen landscaping (Proffer IV). ○ Proposed setback reductions for proposed building expansion and drive isle access to rear of property not to exceed disturbance area of previously approved development within resource management buffer. Status: Resolved. Setback reductions require less land disturbance within the resource management area than the extension of Ashgrove Court.
Environmental Review	<ul style="list-style-type: none"> ○ Clarify issuance of jurisdictional wetlands determination for subject property. Status: Resolved. Wetlands delineation not required (WAIV 2009-0016). ○ Depict River and Stream Corridor 50 foot management buffer surrounding the minor floodplain. Status: Resolved by CDP revision. ○ Depict forest cover and soils layers on CDP. Status: Resolved by CDP revision. ○ Remove trees with high susceptibility to windthrow and supplement remaining vegetated areas with native deciduous species. Status: Resolved. Trees susceptible to windthrow to be removed during site development. Protection of desirable forest cover and supplemental plantings within resource management buffers to be provided. ○ Relocate parking areas and buildings outside of 50 foot resource management buffer. Status: Resolved. Proposed site layout requires less encroachment into resource management buffer than anticipated by the extension of Ashgrove Court.

TOPIC / ISSUE AREA	ISSUES EXAMINED AND STATUS
	<ul style="list-style-type: none"> Recommend commitments to Green Building Practices (LEED). Status: No Issue. Development sensitive to Green Infrastructure identified onsite (stream corridor, forest resources, steep slopes).
Zoning	<ul style="list-style-type: none"> Notation, graphic, zoning reference, and tabular revisions to CDP and proffer statement. Status: Resolved by CDP and proffer statement revisions.
Transportation	<ul style="list-style-type: none"> Identify existing and proposed traffic impact (i.e. site trip generation). Status: Resolved. Supplemental traffic information provided. No road improvements required. Clarify parties responsible for road vacation and completion of cul-de-sac at terminus of Ashgrove Court. Status: Resolved. STPL 2007-0086 identifies road vacation and cul-de-sac improvements to be completed by the Applicant. Clarify justification for abandonment of Ashgrove Court extension. Status: Resolved. Former Parcel 6B consolidated with adjacent Lot 14A. Separate public road access not required.
County Attorney	<ul style="list-style-type: none"> Proffer Statement review and approval to legal form. Status: In progress
Disclosure of Real Parties in Interest	<ul style="list-style-type: none"> Received, dated September 1, 2009

POLICY OR ORDINANCE SECTIONS SUBJECT TO APPLICATION
<u>Revised General Plan</u>
Chapter 5, Green Infrastructure, Policy 1
Chapter 5, River and Stream Corridor Resources, Policy 4, 18
Chapter 5, Forest, Trees and Vegetation, text
Chapter 5, Forest, Trees and Vegetation, Policy 1
Chapter 6, Keynote Employment Center policies, text
Chapter 6, Land Use Pattern and Design, text
Chapter 11, Light Industrial and Regional Office Design Guidelines, text
<u>1972 Zoning Ordinance</u>
Section 723.2: PD-GI District Regulations
Section 723.6.2: Minimum Yard Requirements Adjacent to Residential Districts

III. FINDINGS FOR APPROVAL

1. The Zoning Concept Plan Amendment (ZCPA) application is consistent with the concept development plan and proffers associated with ZMAP 1986-0022, Loudoun Woodland Road Joint Venture, with no resulting change in development density.
2. The Zoning Ordinance Modification (ZMOD) request will satisfy the public purpose by providing adequate separation and screening between industrial and residential use to an equivalent degree.
3. The ZCPA and ZMOD applications are in accordance with the 1972 Zoning Ordinance.
4. The ZCPA application preserves appropriate environmental resources and minimizes impacts on state waters located on the subject property. The resulting abandonment of dedicated right of way for the extension of Ashgrove Court will reduce encroachments into the stream corridor located on the subject property.

IV. PROJECT REVIEW

A. CONTEXT

Background

ZMAP 1986-0022 was approved in October 1987 and rezoned approximately 86.6 acres from PD-IP to PD-GI in order to create the Woodland Road Industrial Park. When the industrial park was subdivided in 1990, Ashgrove Court terminated as a cul-de-sac in front then Lot 14. As a result, a parcel adjacent to Lot 14 located outside the limits of the industrial park (Parcel 6B) became landlocked. Right-of-way was dedicated to extend Ashgrove Court to serve Parcel 6B (See *Figure 1*). Steel fabrication facilities were established on Lot 14 subsequent to the ZMAP approval; however, Parcel 6B and the associated road extension remained undeveloped.

The land use policies in effect at the time of the project's approval (Eastern Loudoun Area Management Plan – ELAMP) designated the area as appropriate for industrial and office uses. The land use designation for the area has changed with adoption and subsequent amendments to the Revised General Plan (RGP). The RGP now designates the property for Keynote Employment uses.

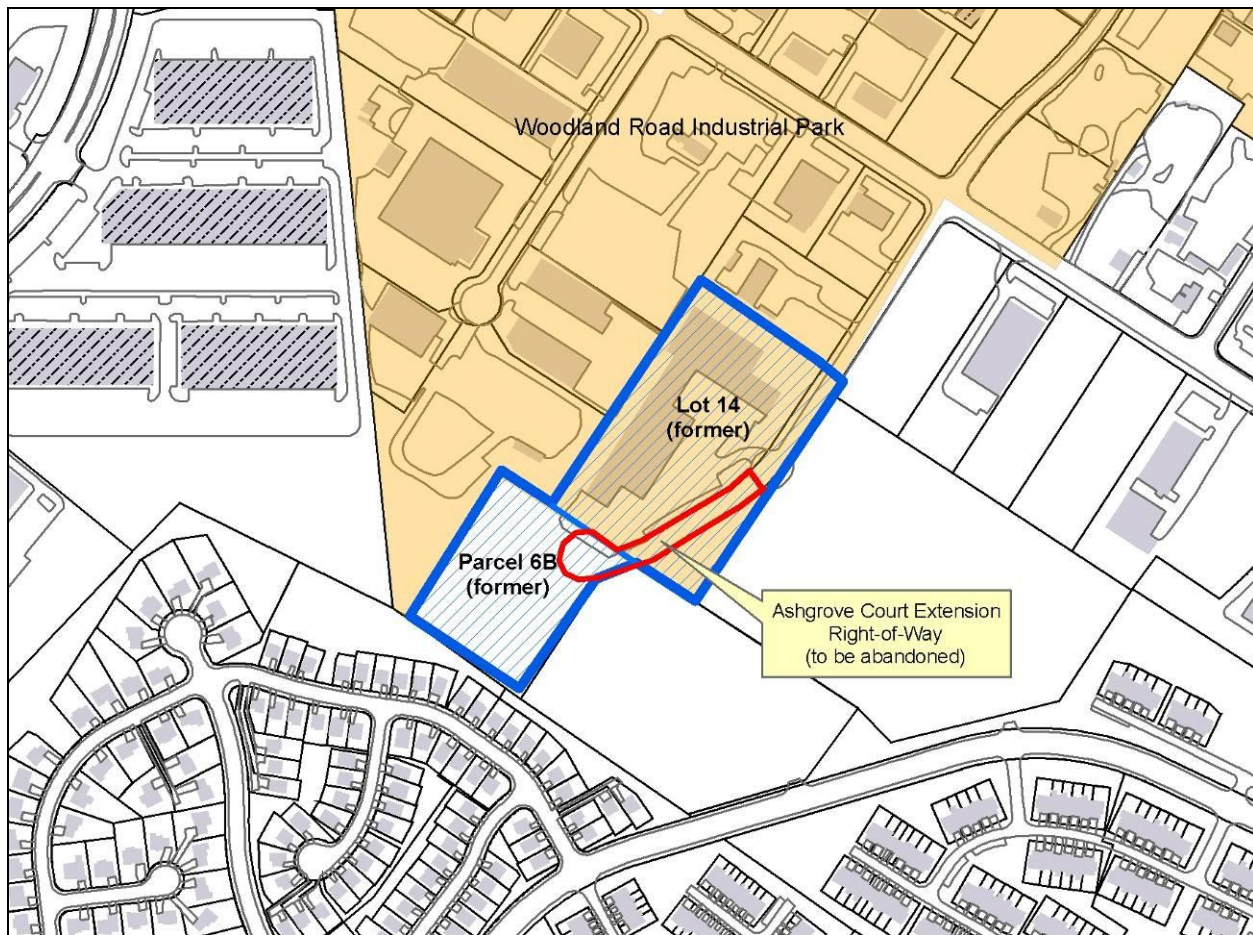


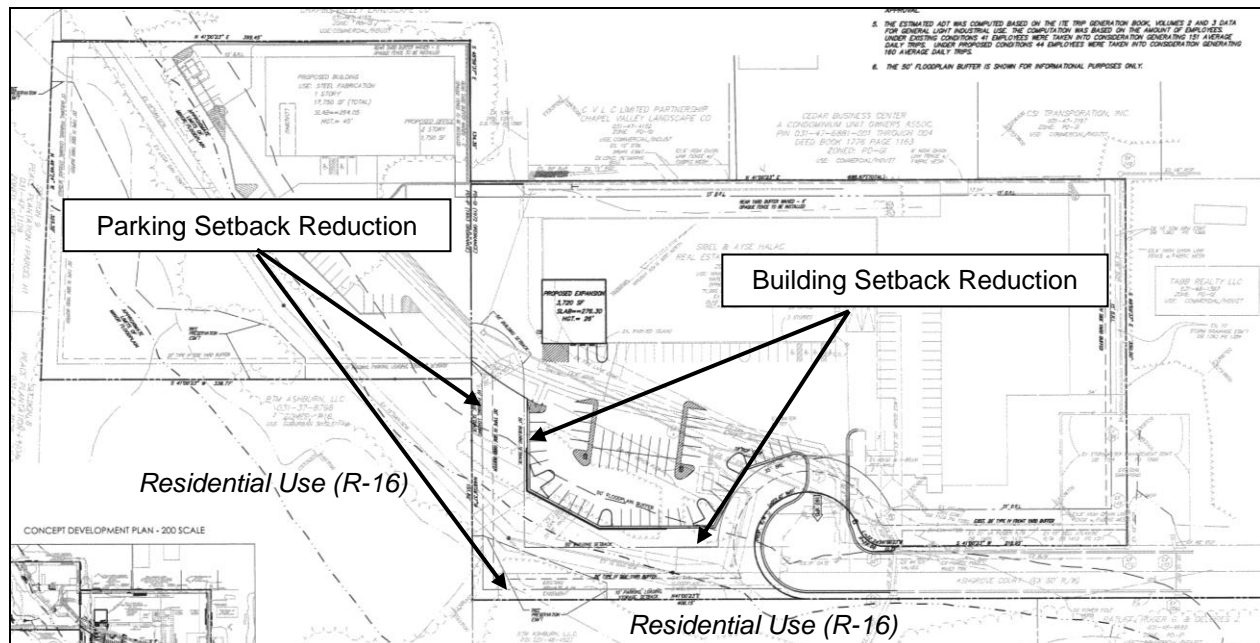
Figure 1. Former Parcel Configuration / ROW Access to Former Parcel 6B

In 2007, ZMAP 2005-0039 (Victoria Station) approved land south and southeast of the subject site to be rezoned from PD-IP (industrial) to R-16 (residential). As a consequence, building and parking setbacks required under the 1972 Zoning Ordinance were increased on the subject site¹.

ZMAP 1986-0022, Proffer 11, requires buffer treatments along the perimeter of the industrial park in order to screen the approved uses from adjacent parcels outside the limits of the project. A boundary line adjustment application approved earlier this year (BLAD 2007-0057) consolidated the adjacent property noted above (Parcel 6B) with the subject site (Lot 14). As a result, the required 50 foot buffer treatment bisects the newly created parcel (See *Figure 2*) and the property is now split-zoned PD-IP under the Revised 1993 Zoning Ordinance and PD-GI under the 1972 Zoning Ordinance. The existing manufacturing use is a permitted use under both zoning districts. The

¹ Section 4-605(B)(2) and (3) of the 1993 Revised 1993 Zoning Ordinance would otherwise reduce the setback to 15 feet when property adjacent to an existing PD-GI zoning district is rezoned to residential use.

Specific to the requested zoning ordinance modifications, the Applicant proposes to modify Section 723.6.2 of the 1972 Zoning Ordinance in order to reduce the minimum yard for a building adjacent to a residential district boundary from 100 feet to 50 feet and reduce the minimum yard for parking/outdoor storage/loading adjacent to a residential district boundary from 50 feet to 10 feet. The modifications would apply in two situations where the subject property (PD-GI) abuts the Victoria Station residential development to the south and southeast (R-16) (See *Figure 3*).



**Figure 3. ZCPA 2008-0008 – Concept Development Plan
(Setback Reduction to Residential use)**

In order to provide an equivalent buffer treatment to that of the 50 foot buffer yard that is requested to be eliminated, the Applicant has designated Tree Save Areas and evergreen planting areas along the tributary to the Broad Run. The alternative buffer treatment and existing forest cover within the floodplain will provide vegetative screening of the adjacent residential uses (See *Figure 4*).

Location

The subject site is approximately 7.73 acres in size and is located in the Woodland Road Industrial Park on the south side of Woodland Road, approximately 1500 feet west of Cascades Parkway at the end of Ashgrove Court (See *Vicinity Map, Page 3*). The site is also located within the Route 28 Tax District. Other developments surrounding the site include Peace Plantation I to the southwest and the undeveloped Victoria Station to the south and southeast (both residential developments). The greater Woodland Road Industrial Park is located north and northeast of the site.

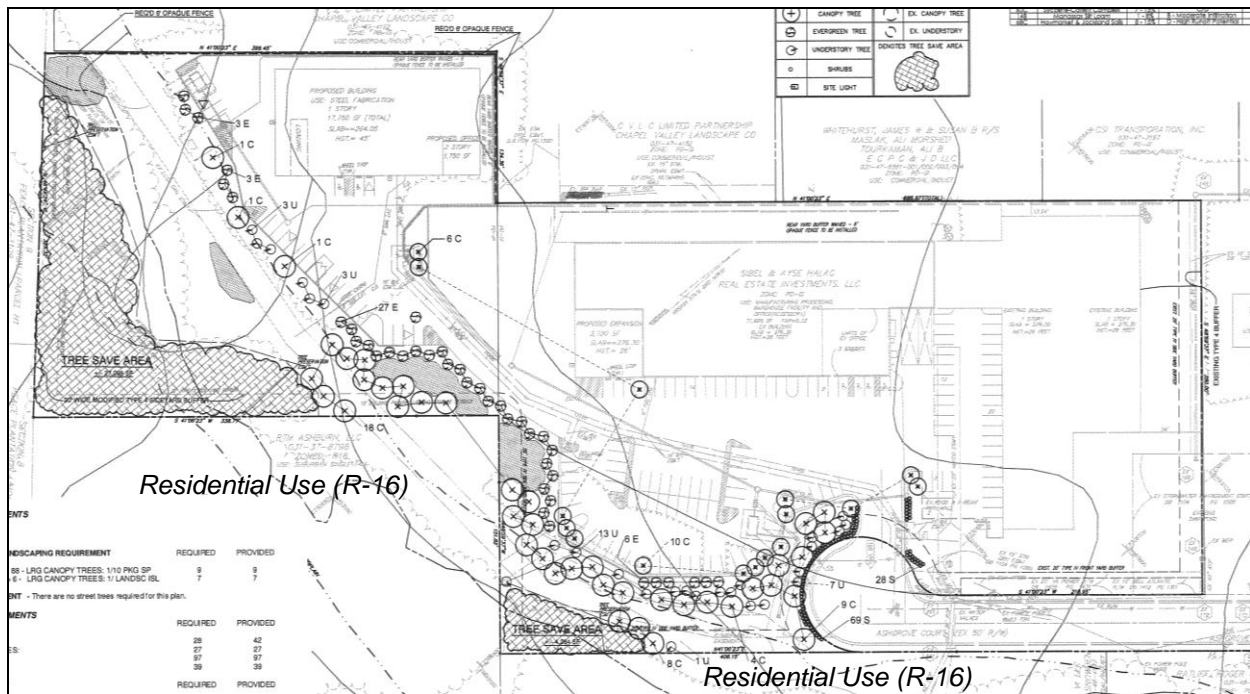


Figure 4. ZCPA 2008-0008 – Landscape Plan, Exhibit C

Transportation

The subject site is currently accessed via Ashgrove Court. Consolidation of Lot 14 and Parcel 6B has eliminated the need to extend Ashgrove Court from its existing terminus to the former Parcel 6B. Traffic information provided by the applicant indicates the project will generate approximately 160 daily trips at build out, an increase of 9 daily trips.

Site Conditions

The property contains river and stream corridor resources including several areas of desirable forest cover, moderately and very steep slopes, and minor floodplain associated with a tributary to the Broad Run. Areas of the property have been disturbed as part of the installation of sanitary sewer facilities along the tributary to Cabin Branch and development associated with the existing steel fabrication facilities.

B. SUMMARY OF OUTSTANDING ISSUES

There are no outstanding issues identified by Staff. The final proffer statement and associated Concept Development Plan are under review by the County Attorney's Office.

C. OVERALL ANALYSIS

REVISED GENERAL PLAN (RGP)

The property is located in the Sterling Community of the Suburban Policy Area and has been reviewed under the Keynote Employment and Green Infrastructure policies specific to the applicant's request to eliminate a previously proffered vegetative buffer and reduce yard setbacks to a residential district. Site design for the existing and proposed manufacturing land use has not been reviewed for compliance with RGP policies as the existing and proposed steel fabrication facilities are a permitted use within the PD-GI zoning district.

Land Use

The Revised General Plan identifies the site as suitable for Keynote Employment uses. Keynote Employment developments are envisioned as large-scale, prominent, high visual quality office and research-and-development centers supported by ancillary retail and personal services. RGP policies support regional and nationally oriented office centers within the Route 28 Corridor. As such, the overall appearance and design of developments within the Corridor should relate to the corporate image of the surrounding Keynote Employment and Business Centers in the area.

When approved in 1987, the Woodland Road Industrial Park was determined to be in accordance with the Eastern Loudoun Area Management Plan (ELAMP) which at the time designated the area as appropriate for industrial and office land uses. The subsequent Choices and Changes General Plan (1991) and current Revised General Plan (2001) changed the land use designation of the area to Keynote Employment use. While an industrial land use would not otherwise be considered a use consistent with Keynote Employment designation of the area, it may be appropriate to allow industrial uses established under previous plans, such as the existing steel fabrication facility on the subject site and other established manufacturing uses within the Woodland Road Industrial Park, to continue until such time as Keynote Employment uses are feasible to develop in the area.

The existing manufacturing use is not consistent with the Keynote Employment land use policies of the RGP. However, given the nature of the Woodland Road development as an industrial park and its original rezoning approval which was consistent with the ELAMP, staff can support the application.

Existing Conditions – Green Infrastructure

The County's Green Infrastructure is a collection of natural, cultural, heritage, environmental, protected, passive and active resources which are integrated in a related system. Elements of the countywide Green Infrastructure are found on the subject site including several areas of desirable forest cover, moderately and very steep slopes, and

minor floodplain associated with a tributary to the Broad Run (See *Figure 5*). The land use policies of the RGP direct that development should take place around these elements, incorporating them into the design of the site. Such an approach places a priority on preserving both sensitive environmental and man-made features.



Figure 5. Minor Floodplain, Tributary to Broad Run

Specific to river and stream corridor resources, RGP policies call for the establishment of a 50-foot management buffer around the 100-year floodplain and adjacent steep slopes in order to protect the County's stream corridors and associated natural riparian forests. The Applicant proposes to encroach upon the prescribed 50 foot management buffer in order to accommodate parking areas and a drive isle associated with the expansion of the existing steel fabrication facilities and construction of a second facility; however, the encroachment does not increase land disturbance within the buffer beyond what was previously permitted for the extension of Ashgrove Court (See *Figure 6*). As noted above, the consolidation of Lot 14 and Parcel 6B will result in the abandonment of right-of-way associated with the previously proposed extension of Ashgrove Court to the former Parcel 6B. Disturbance beyond the limits associated with extension of Ashgrove Court would otherwise be contrary to RGP policies by allowing further encroachments into the stream's corridor and negatively impacting the existing riparian forest surrounding this stream.

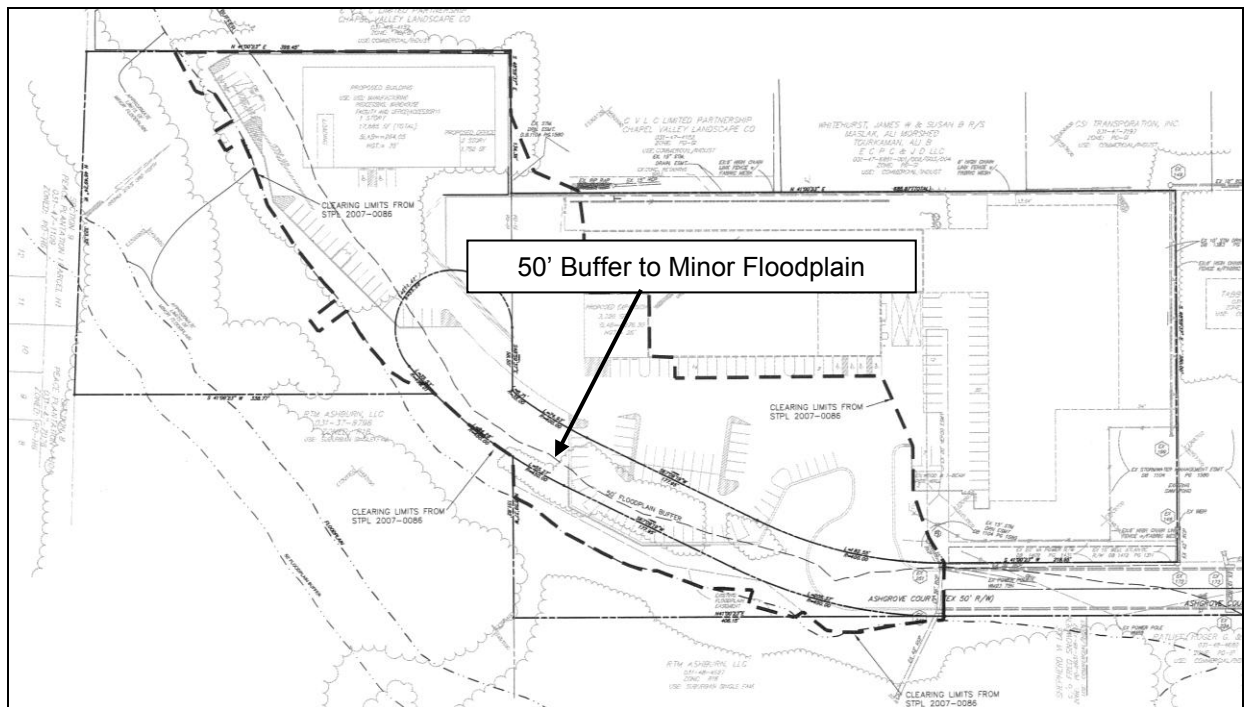


Figure 6. ROW to be Abandoned (Ashgrove Court Extension); Proposed Parking Configuration; 50 Foot Buffer to Minor Floodplain

The Applicant also proposes to eliminate a portion of a previously proffered 50 foot landscape buffer yard which was intended to screen uses outside the limits of the greater Woodland Road Industrial park and would have increased trees and vegetation on the subject site. In support of RGP policies which encourage the preservation, protection, and management of forest resources as a means to improve air quality, filter stormwater runoff, and improve aesthetic quality, staff recommended equivalent plantings be provided within the stream corridor located on the subject property. In response, the Applicant revised the Concept Development Plan (CDP) and proffer statement to include commitments to relocate 58 evergreen trees that were otherwise required within the 50 foot landscape buffer yard to areas within the minor floodplain as well as designated Tree Save Areas to provide equivalent screening of adjacent residential uses (See Figure 4).

Staff is agreeable to the alternative approach to address the Green Infrastructure policies of the RGP and can support the application as proposed.

ENVIRONMENTAL REVIEW

Building Efficiency / LEED

RGP policies state the County will emphasize its role as a leader, facilitator, and source of information on environmental design options and procedures rather than as a

regulator when implementing its program for achieving and sustaining a built environment of high quality. The RGP supports a built design that helps sustain the natural environment. Accordingly, the County endorses design measures that conserve energy and water and improve air quality.

Staff suggests land use proposals incorporate the Green Building Practices endorsed by the United States Green Building Council's Leadership and Energy and Environmental Design (LEED) program in order to achieve the County's Green Infrastructure Policies and Planning Approaches to water conservation, solid waste management, and air quality.

In response to the staff suggestion to incorporate LEED practices, the Applicant states the unique characteristics of the site and the configuration of existing buildings make it difficult to address LEED standards regarding site design; however, the Applicant will evaluate the feasibility of incorporating LEED standards in the final design of the new facilities and related improvements. The Applicant has agreed to preserve stream corridor resources on the subject property by means of Tree Save Areas and supplemental vegetation within the floodplain.

ZONING

Technical and administrative amendments to the Concept Development Plan (CDP) and proffer statement were noted during the staff review of the application and have been adequately addressed by the Applicant. As noted above, a boundary line adjustment application approved earlier this year (BLAD 2007-0057) consolidated an adjacent property outside the limits of the ZMAP 1986-0022 with the subject site. As a result, the newly created parcel is split-zoned PD-IP under the Revised 1993 Zoning Ordinance and PD-GI under the 1972 Zoning Ordinance. The existing manufacturing use is a permitted use in both zoning districts. The proposed ZCPA and the ZMOD applications apply only to the portion of the property located in the PD-GI zoning district. The subject property is located within the Route 28 Taxing District and is also located partially within the FOD (Floodplain Overlay District).

Zoning Modification

The Applicant is also requesting modifications of Section 723.6.2 of the 1972 Zoning Ordinance in order to reduce the minimum yard for a building adjacent to a residential district boundary from 100 feet to 50 feet and reduce the minimum yard for parking/outdoor storage/loading adjacent to a residential district boundary from 50 feet to 10 feet. The setbacks were imposed on the subject property when the adjacent Victoria Station residential development was rezoned from PD-IP to R-16 in 2007. The reduction of yard setbacks will assist the expansion of the existing steel fabrication facility as well as provide parking and drive isle access to a new fabrication facility at the rear of the property. As the proposed building expansion, proposed parking and associated drive isle do not appear to increase land disturbance beyond what would

have otherwise been required for the extension of Ashgrove Court, a modification of the setbacks is justified. Further, the stream corridor resources located along the eastern portion of the property provide a significant vegetative buffer as well as physically separate the industrial property from adjacent residential uses (at least 180 feet). As such, staff has determined that the ZCPA and ZMOD applications will satisfy the public purpose to at least an equivalent degree and can therefore be supported (Section 700.2 of the 1972 Zoning Ordinance). Existing environmental features, Tree Save Areas, and supplemental plantings between industrial and residential uses will provide adequate distance and separation.

TRANSPORTATION

Existing, Planned and Programmed Roads

The subject parcel is accessed via Woodland Road at the terminus of Ashgrove Court. Woodland Road (Route 679) is constructed as a 4-lane undivided road. The Revised Countywide Transportation Plan (CTP) calls for Woodland Road to be a four lane undivided road minor collector road within 70 feet of right-of-way. Ashgrove Court is a two lane local road. The road segment providing access to the subject site has not been accepted into the VDOT system; however, a site plan to expand the existing steel fabrication facilities (STPL 2007-0086) will require the applicant to provide right-of-way and bond and construct Ashgrove Court as a permanent cul-de-sac at the subject property's entrance. As noted above, consolidation of Lot 14 and Parcel 6B has eliminated the need to extend Ashgrove Court from its existing terminus to the former Parcel 6B.

Traffic information provided by the applicant indicates the project will generate approximately 160 daily trips at build out, an increase of 9 daily trips. No additional road improvements are necessary to mitigate the nominal increase in traffic generated by the expanded steel fabrication facilities. Further, as noted above, the review of the applications is limited to the request to eliminate a proffered buffer yard and zoning modifications to reduce yard setbacks.

COUNTY ATTORNEY

The Applicants' proffer statement has not been approved as to legal form, and additional review and discussion of recent applicant revisions dated July 22, 2009 is anticipated.

D. ZONING ORDINANCE CRITERIA FOR APPROVAL

Section 1208.2 of the 1972 Loudoun County Zoning Ordinance states "The Board shall determine that the following requirements are met, or be assured that they will be met, in acting upon a petition to change the zoning boundaries or classification of property on the zoning map:"

Standard *1208.2.1 Relation to major roads. Except as otherwise specifically provided herein, parcels which are the subject of requests for changes of zoning classification shall be so located with respect to arterial or collector roads as to provide direct access to such parcel without creating increased traffic along minor streets in residential neighborhoods outside the district. Neither enlargement nor extension of such arterial or collector roads shall be required in a manner, form, character, location, degree, scale, or at such time, as would result in a higher net public cost than would development and forms generally permitted under existing zoning on the parcel or parcels which are the subject of the petition.*

Analysis The Applicant's traffic information does not indicate increased traffic along minor streets in residential neighborhoods outside the PD-GI zoning district. New road improvements are not necessary to serve the subject property.

Standard *1208.2.2 Relation to utilities. Except as otherwise specifically provided herein, districts shall be so located in relation to sanitary sewers, water lines, storm and drainage systems and other utilities systems and installations, that neither enlargement nor extension of such system will be required in a manner, form, character, location, degree, scale, or at such time, as would result in a higher net public cost than would development in forms generally permitted under existing zoning on the parcel or parcels which are the subject of the zoning petition.*

Analysis The subject property will be served by an extension of public water and sewer otherwise provided to the existing steel fabrication facility and adjacent developments. All utilities will be designed and constructed in accordance with applicable County and State standards.

Standard *1208.2.3 Relation to public facilities. Except as otherwise specifically provided herein, districts shall be so located, designed and scaled with respect to necessary public facilities, including in the case of development of a residential character, public schools, parks, recreational sites, open spaces and other facilities, that the net public cost is not greater than the public cost as would result under the existing zoning of the parcel.*

Analysis The requested amendment does not propose residential development. There is no discernible, immediate impact on County expenditures associated with the ZCPA and ZMOD applications. As with most commercial projects, it is anticipated that revenues generated by the use will exceed the cost of providing public services.

Standard *1208.2.4 Additional public facilities. Except as otherwise specifically provided herein, the zoning classification of parcels which are the subject*

of requests for changes of their classifications, shall not be changed if development, as would be permitted under the new classification, would create the need or necessity for additional public facilities, including, in the case of development of a residential character, public schools, parks, recreational sites, open spaces and other facilities, and the net public costs would be greater than the public costs for the public facilities necessitated by development as permitted under the existing zoning of the parcel.

Analysis As noted above, residential development is not proposed. Approval of the applications will not create the need or necessity for additional public facilities beyond those that are already available. As with most commercial projects, it is anticipated that revenues generated by the use will exceed the cost of providing public services.

V. ATTACHMENTS (UNLESS NOTED OTHERWISE, ATTACHMENTS ARE NOT AVAILABLE ELECTRONICALLY BUT MAY BE OBTAINED FROM THE DEPARTMENT OF PLANNING)	PAGE NUMBER
1. Review Agency Comments	
a. Planning, Comprehensive Planning (06-30-09, 03-09-09)	A-1
b. Building and Development, Zoning (06-11-09, 09-09-09)	A-9
c. Building and Development, ERT (06-12-09, 02-26-09)	A-13
d. Office of Transportation Services (07-21-09, 02-18-09)	A-23
e. Virginia Department of Transportation (02-04-09)	A-29
f. Loudoun Water (LCSA) (01-12-09)	A-31
g. Fire, Rescue, and Emergency Management (03-10-09)	A-33
h. Department of General Services (03-06-09)	A-35
2. Disclosure of Real Parties in Interest (09-01-09)	A-37
3. Applicant's Response to Referral Comments (07-30-09, 05-22-09)	A-47
4. Applicant's Statement of Justification (05-22-09)	A-73
5. Applicant Draft Proffer Statement (07-22-09)	A-81
6. Plat / Concept Development Plan (revised 07-22-09)	Follows A-84